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Via ECF

February 7, 2020

MEMO ENDORSED

Hon. Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas Street, Chambers 533
White Plains, NY 10601

Re: Vichna Ginsburg v. Visiting Nurse Service of New York/CHOICE (19-cv-11899)

Dear Judge Karas:

We represent the Defendants, VNS CHOICE d/b/a VNSNY CHOICE and Visiting Nurse Service of New York (collectively, "Defendants"), in the above-referenced matter. We respectfully request permission to file a letter motion under seal.

As will be explained in greater detail in the forthcoming letter motion, Plaintiff's Complaint contains information about VNSNY CHOICE's health plan members that is protected from disclosure by the Health Insurance Portability and Accountability Act (HIPAA). Defendants plan to file a letter motion requesting that portions of the Complaint containing HIPAA-protected information be redacted. Defendants' letter motion will identify which information it considers to be HIPAA-protected. Because Defendants' letter motion must contain HIPAA-protected information to identify the protected information that was disclosed, we request permission to file the letter motion under seal.

Thank you for your consideration of this matter.

Granted.

Respectfully Submitted,

The Clerk of the Court is directed to
mail a copy of this Order to the Plaintiff

Amanda M. Baker, Esq.

SO ORDERED

KENNETH M. KARAS U.S.D.J.

2/10/2020